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May 5, 1998

OUR FILE NO.
1137-103-60

BY HAND

Magalie R. Salas, Esq.

Secretary

Federal Communications Commission

1919 M Street, N.W.

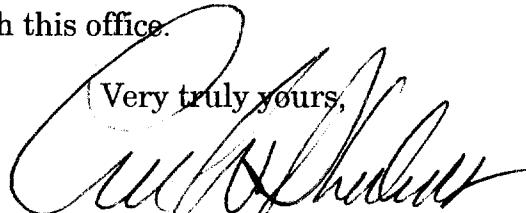
Washington, DC 20554

Re: Petition for Rulemaking to Amend Section 73.202(b),
the Table of Allotments, for Clio, Michigan

Dear Ms. Salas

Transmitted herewith, on behalf of Faircom Flint Inc., the licensee of radio broadcast station WWBN(FM), Tuscola, Michigan, is an original and four (4) copies of a Petition for Rulemaking that seeks to amend Section 73.202(b) of the Commission's Rules by re-allotting Channel 268A from Tuscola, Michigan, to Clio, Michigan, as that community's first local aural service.

Should further information be desired in connection with this matter, kindly communicate directly with this office.

Very truly yours,

Lee W. Shubert

LWS/blr

ORIGINAL

Before the

Federal Communications Commission

Washington, D.C. 20554

In The Matter Of

Amendment of Section 73.202(b)
 Table of Allotments,
 FM Broadcast Stations
 Tuscola, Michigan and
 Clio, Michigan

MM Docket No.
 RM-

PETITION FOR RULEMAKING

107 - 5 1003

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

PETITION FOR RULEMAKING

Faircom Flint Inc. ("Faircom"), licensee of FM broadcast station WWBN, Tuscola, Michigan, by its attorneys and pursuant to Section 1.401 and consistent with Section 1.420(i) of the Commission's Rules, hereby requests that the Commission amend the FM Table of Allotments (Section 73.202(b)) of the Rules as follows:

CITY	PRESENT ALLOTMENT	PROPOSED ALLOTMENT
Tuscola, Michigan	268A	---
Clio, Michigan	---	268A

Additionally, Faircom requests that the Commission, accordingly, order the modification of the license for WWBN(FM) to permit WWBN to serve Clio, Michigan, on Channel 268A as that community's first local aural

transmission service.¹ In support thereof, the following is respectfully submitted:

I. DISCUSSION

Radio station WWBN(FM) currently is licensed to the community of Tuscola, Michigan. Faircom seeks to change WWBN's community of license from Tuscola, Michigan to Clio, Michigan, because Faircom has determined that Clio has an overwhelming need for the provision of its first aural service.

Clio is an incorporated city, located in Genesee County, with a population of 2,629 persons, based on 1990 U.S. Census data, with a Mayor and city council form of government. Clio has its own independent, volunteer fire department that is served by 52 volunteers and 10 full-time employees. It also has its own police chief and a local police force. Clio offers its residents a diverse selection of municipal services, businesses and cultural resources.

Children in Clio attend a local elementary school and high school.² In their leisure time, students also visit the Ligon Outdoor Center, which serves

¹ While it has imposed a temporary freeze on the filing of further applications in all commercial broadcast services, the Commission will continue to accept and process petitions for rule making requesting the allotment of new FM channels to the FM Table of Allotments. See *Competitive Bidding for Commercial Broadcast and Instructional Television Fixed Service Licenses*, MM Docket No. 97-234, FCC 97-397, at ¶ 61 (released November 26, 1997).

² In the 1992-93 school year there were 3,842 students (K-12) enrolled in the Clio Area School District, with an instructional staff of 162.

the educational and recreational needs of students and educators in the Genesee and Lapeer Intermediate School District service areas. Located in Clio, this diverse 268-acre parcel of land provides teachers and students a place to enjoy and participate in outdoor arts, research projects, cross-country skiing, hiking, stargazing and other outdoor education curriculum development.

Another recreational feature in Clio is the Vienna Greens Gold Course, an 18 hole (6,200 yard) public golf course located on East Tobias Road.

A major attraction in Clio is the Clio Cast and Crew, a local theater group, that has led the town in the building of an Art Center and Amphitheater, and performs spring, summer and fall productions. The group also has recently added a winter and spring youth production by the Clio Electric Youth Theater, a small division of the Clio Cast and Crew.

A plethora of businesses operate in Clio. More than 340 commercial businesses *located within* Clio, Michigan, belong to the Clio Area Chamber of Commerce, along with 40 civic and community organizations and churches. See *Attachment A*. Clio is the home to Blue Lakes Charters and Tours Motorcoach Company that operates a fleet of 40 motor coaches that provide touring and transportation services for the entire region.³ Among the other

³ 12154 N. Saginaw Road, Clio, MI 48420.

businesses are several gasoline service stations and petroleum vendors,⁴ a pest control company,⁵ the Personal Fitness Clinic,⁶ and two nursing and convalescent homes.⁷ Clio also has its own industrial park.

Numerous professionals also conduct business in Clio, Michigan. More than a half dozen physicians, including surgeons and osteopaths practice medicine in the community.⁸ In addition there are at least two opticians⁹, a half dozen dentists¹⁰ and attorneys,¹¹ four veterinarians serving two veterinary clinics,¹² and an accounting firm.¹³

The *Genesee County Herald*, a weekly newspaper is also published in Clio, while nearly two dozen houses of worship of various faiths are established within Clio, Michigan.

⁴ Mill Street Station, Mooney Oil, North Pointe Marathon and Sunoco Food Mart

⁵ ABC Pest Control, 9063 Forrest Pinde Dr., Clio, MI 84820.

⁶ 164 W. Vienna, Suite Four, Clio, Michigan 48420.

⁷ Caldwell Adult Foster Care and Clio Convalescent Center.

⁸ Aftab A. Aftab, MD, Clio Road; the Clio Family Practice Center, W. Vienna Road; Myriam Edwards, MD, S. Mill St.; Siva V. Sankran, MD, W. Vienna Road; Gary Garrett, D.O., S. Mill St.; Mark Kiffer, D.O., W. Vienna Rd., Brenda Rogers, D.O., W. Vienna Road.

⁹ Advance Optical Service and Clio Vision Service.

¹⁰ Timothy Miller, of the Clio Dental Center; Gregory S. Peacock, DDS; Paul J. Racine, DDS; Frank G. Radtke, DDS; John M. Randall, DDS; and Ronald A. Wright, DDS

¹¹ Ira Bare, Esq., N. Mill St.; Charles W. Bird, Esq., W. Vienna Road; Ronald Brewer, Esq., N. Mill St.; Robert J. Dewey, Esq., N. Mill St.; Otis Stout, Esq., N. Mill St.; Brian E. Thiede, Esq., Clio Road; Garner K. Train, Esq., N. Morrish Road; Jack E. Tubbs, Esq., Elms Road;

¹² Kendra Freeman, D.V.M.; Laurence Green, D.V.M.; and Stephen Hudgens, D.V.M., at the Fohey Veterinary Hospital, S. Mill St.; and Jude Swalley, D.V.M., at the North Elms Veterinary Clinic, Elms Road.

¹³ Brachel & Shumate, P.C., on W. Vienna St.

TECHNICAL PROPOSAL. Faircom has determined that Channel 268A can be allocated to the city of Clio as its first local aural service. An engineering study of the proposed allocation, demonstrating compliance with the technical standards for allocating a new channel, is appended hereto as *Attachment B*. The proposed Channel 268A allotment can be made to Clio with a site restriction of 9.60 kilometers north northwest of the city, in full compliance with the FM spacing rules. For purposes of the allocation, the reference coordinates for Clio are North Latitude 43° 15' 47" and West Longitude 83° 45' 40". No other full service broadcasters are affected by this proposal and operations from these coordinates would provide city grade service levels as set forth in Section 73.315 of the Commission's Rules.¹⁴

Should the Commission amend the FM Table of Allotments as requested herein, Faircom will promptly file an application for modification of its license, construct the modified facilities, place those facilities in operation, and will seek a license covering the Clio facility.

The proposal set forth in this Petition is consistent with the procedures authorized in *Amendment of the Commission's Rules Regarding Modification*

¹⁴ It should be noted the allotment of Channel 268A at Tuscola is a specially negotiated short-spaced allotment with Sarnia, Ontario, Canada. See *Coleman, Sebewaing, and Tuscola, Michigan*, 11 FCC Rcd 11286, 11289 (1996).

of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), as modified by *Amendment of the Commission's Rules*

Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094 (1990) ("Community of License MO&O").

Allotting Channel 268A to Clio would permit Clio to receive its first local aural channel, thereby serving the highest of the Commission's existing allocation priorities. "There are virtually no populated areas of the country where our higher allotment priorities, such as first reception service, have not been attained. Therefore, as a practical matter, provision of first local aural service is the highest of our allotment priorities which remains in any significant degree unsatisfied."¹⁵

WAIVER REQUEST REGARDING REMOVAL OF FM CHANNEL 268A FROM TUSCOLA, MICHIGAN. Faircom acknowledges that while its proposal would provide a first local aural transmission service to Clio, it also would remove Tuscola's local transmission service, since WWBN is the only station licensed to serve the Tuscola community. However, although the *Community of License MO&O* restricts the removal of a community's sole local transmission service, a waiver of the prohibition will be considered in "circumstances where the removal of a local service might serve the public interest."¹⁶

¹⁵ 5 FCC Rcd at 7097, ¶ 16.

¹⁶ *Community of License MO&O*, 5 FCC Rcd 7096.

Faircom's proposal plainly would serve the public interest. First, Faircom's proposal would provide first reception service to a significantly sized population. As stated above, Clio is an incorporated city, with a population of 2,629 people. Tuscola, on the other hand, is not incorporated, is not listed in the 1990 U.S. Census, and has an estimated population of just 100 persons.¹⁷

Pursuant to Faircom's proposal, WWBN would serve a substantially larger number of area residents than it does with its currently authorized facilities.¹⁸ As evidenced by the attached Engineering Statement (*Exhibit B*, hereto), at the reference point site, the predicted population within the 60 dBu service contour would be 355,565, up from the 168,851 persons presently served by WWBN. See *Exhibit B*, p. 2. Faircom's proposal would thus provide service to an additional 186,714 persons — representing more than a 110 percent increase in population coverage — thus more than doubling the number of people served by WWBN.¹⁹

¹⁷ *Rand McNally Commercial Atlas and Marketing Guide*, p. 383 (124th ed. 1993); U.S. Gazetteer, 1990 Census. The Census Bureau identifies only the County and Township of Tuscola, Michigan, but not a city, village or town.

¹⁸ No part of the 70 dBu contour, when measured from the reference point, would fall upon an urbanized area. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995).

¹⁹ The reallocation of Channel 268A from Tuscola, Michigan, as a local transmission service will afford 60 dBu service to 234,143 people. The Tuscola service dispossession will be to 47,657 persons now residing within WWBN's 60 dBu contour. See *Attachment B*, p. 3.

Although this proposal contemplates the removal from Tuscola, Michigan, of Channel 268A as the community's sole local transmission service, the community would continue to enjoy city-grade aural reception service from at least five FM radio stations, including WWBN.²⁰

In sum, reallocation of Channel 268A from Tuscola to Clio would result in a net service benefit to both communities, and will best serve the Commission's allocation priorities and the public interest. With a resulting 1.0 mV/m service contour population gain to loss ratio of more than 4.9:1, favorable action on Faircom's proposal would thus be in the public interest.²¹

II. CONCLUSION

For the reasons stated above, the public interest will be served by the allotment of Channel 268A to Clio, Michigan, as its first local aural service. Accordingly, Faircom respectfully requests the Commission institute a rule making proceeding that would amend the FM Table of Allotments as follows:

²⁰ Utilizing the proposed reference point, Tuscola will continue to receive existing city-grade service because the 70 dBu signal from Channel 268A will reach the entire Tuscola area. See *Attachment B* at p. 3, and *Exhibit E-2*, thereto.

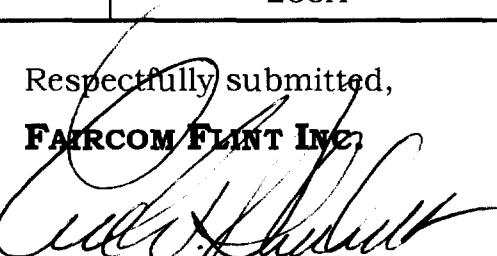
²¹ The 60 dBu contour population gain of 234,143 when divided by 47,657 (the served-population lost when measured from the proposed reference point) yields 4.913, or a gain of nearly 5 people for every single person lost as a result of the channel reallocation. See *Attachment B*, page 3. The 70 dBu gain to loss ratio will be a remarkable 5.45:1 ($163,249 \div 29,966 = 5.447808$). See *Attachment B*, page 3.

CITY	PRESENT ALLOTMENT	PROPOSED ALLOTMENT
Tuscola, Michigan	268A	---
Clio, Michigan	---	268A

Respectfully submitted,

FAIRCOM FLINT INC.

By:



Lee W. Shubert

Its Attorneys

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May 5, 1998

FAIRCOM FLINT INC.
Petition for Rulemaking for Clio, Michigan

ATTACHMENT A

BUSINESS MEMBERS OF CLIO AREA CHAMBER OF COMMERCE

1. A & A Contracting, 1310 E. Wilson, Clio, MI 48420
2. A All American Floor Care, 2131 E. Lake, Clio, MI 48420
3. A Service Supply Alternative, 9168 Bray, Clio, MI 48420
4. ABC Seamless, 5414 E. Vienna, Clio, MI 48420
5. Able Cement Contracting, 14406 N. Saginaw, Clio, MI 48420
6. Accurate Bump & Paint, 12270 N. Saginaw, Clio, MI 48420
7. ACO Hardware Inc., G-2187 W. Vienna, Clio, MI 48420
8. A-Crete Concrete, 14151 N. Saginaw, Clio, MI 48420
9. Add A Room Storage, 10243 Linden Rd., Clio, MI 48420
10. Advance Optical, 425 1/2 W. Vienna, Clio, MI 48420
11. Advance Physical Therapy, 303 S. Mill, Clio, MI 48420
12. AFAB Complete Drywall, 6231 W. Wilson, Clio, MI 48420
13. AKVO Educational Research, 3084 W. Willard, Clio, MI 4420
14. Al's Service, 1068 W. Vienna, Clio, MI 48420
15. Alexander's Party Store, 14071 N. Saginaw, Clio, MI 48420
16. All Decked Out Limousine Service, 2435 Valley Church, Clio, MI 48420
17. Alliance Management Group, 13141 Linden, Clio, MI 48420
18. Allstate Insurance, 3380 W. Vienna, Clio, MI 48420
19. Alpha Laser, 11243 Lewis, Clio, MI 48420
20. Ameron Homes, 11311 Bray Rd., Clio, MI 48420
21. Anderson Air Conditioning, Andrew Musson Enterprises, 12198 N. Saginaw, Clio, MI 48420
22. Angelique's, 319 W. Vienna, Clio, MI 48420
23. Antique Machinery Club, c/o Eldon Galbraith, 605 N. Mill, Clio, MI 40420
24. Antiques & Collectibles, 12140 N. Saginaw, Clio, MI 48420
25. Appliance Services Unlimited, 11320 Wing, Clio, MI 48420
26. Arby's Restaurant, 4229 W. Vienna, Clio, MI 48420
27. Attab A. Aftab, M.D., 10118 Clio Rd., Clio, MI 48420
28. Auto Brite Super Wash, 11661 N. Saginaw, Clio, MI 48420
29. Auto City Speedway, G-10209 N. Saginaw, Clio, MI 48420
30. Auto Works, Inc., G-2183 W. Vienna, Clio, MI 48420
31. B & D Auto Parts & Sales, 18325 N. Saginaw, Clio, MI 48420
32. B & G Bump Shop, William Redmond, G-10185 N. Saginaw, Clio, MI 48420
33. B & H Insurance, 172 W. Vienna #5, Clio, MI 48420
34. B & H Painting, 2251 E. Wilson, Clio, MI 48420
35. B/V Beauty Supply, 11465 N. Saginaw, Clio, MI 48420
36. Bailey's Engine & Repair Shop, G-1 196 W. Vienna, Clio, MI 48420
37. Balok & Sons Enterprises, 11453 N. Genesee, Clio, MI 48420
38. Bankers Choice Real Estate Group, 11424 N. Saginaw, Clio, MI 48420
39. Bare, Ira D., Atty., Professional Bldg., Clio, MI 48420
40. Bauman's Music, 124 N. Mill, Clio, MI 48420
41. BDC Towing, 13444 Lewis, Clio, MI 48420
42. Beach Bum Tanning, 620 Mill, Clio, MI 48420
43. Beach, Dr. John D. C., 3337 W. Vienna, Clio, MI 48420
44. Beautiful Life Source Forever, 14101 N. Saginaw, Clio, MI 48420
45. Beecher Manor, 192 W. Vienna, Clio, MI 48420
46. Benson Contracting, 3086 W. Farrand, Clio, MI 48420
47. Best Janitorial & Carpet Cleaning, 13394 N. Saginaw, Clio, MI 48420
48. Big Boy Restaurant, 4447 W. Vienna, Clio, MI 48420
49. Big Storage, 10030 N. Center, Clio, MI 49420
50. Bird, Charles Attorney, 2113 W. Vienna, Clio, MI 48420
51. Bishop Auto Sales, 404 S. Mill, Clio, MI 40420
52. Bits & Pieces Jewelers, 106 W. Vienna, Clio, MI 48420
53. Blackmore-Rowe Ins., 196 W. Vienna, Clio, MI 4800
54. Bloss Hardware, 14007 Lewis, Clio, MI 48420
55. Blue Lakes Charters & Tours, 12154 N. Saginaw, Clio MI 48420
56. Borden's Pharmacy, 5 14 W Vienna, Clio IM 48420

**FAIRCOM FLINT INC.
Petition for Rulemaking for Clio, Michigan**

ATTACHMENT A

57. Brachel & Shumate, CPA's, 114 W Vienna,, Clio, MI 48420
58. Brooksbilt Construction, 434 W. Vienna, Clio MI 48420
59. Busy B's Yard Service & Landscaping Inc., 1114 W. Lake Rd., Clio, MI 48420
60. Buxton Trucking 11199 Bare DR Clio N11 49420
61. C & S Outfitters, 11394 N. Saginaw, Clio, MI 48420
62. Catering & Mom, 3493 Barker, Clio, MI 48420
63. Century 21 Woodland, G41 11 W. Vienna, Clio, MI 43420
64. Century Parking Lot Maintenance, 3138 E. Farrand, Clio, MI 48420
65. Certified Investing Service, 11190 Linden, Clio, MI 48420
66. Chandiers Dirt Farm, 6399 E. Vienna, Clio, MI 48420
67. Children's Express, 2128 W. Vienna, P.O Box, Clio, MI 48420
68. Children's Garden, 2212 E. Lake, Clio, MI 48420
69. CIAR Enterprises, 11411 N Saginaw, Clio MI 48420
70. Cinnamon Stick Bed & Breakfast, 12364 N. Genesee, Clio, MI 48420
71. Circus Park, P.O. Box 13, Clio, MI 48420
72. Citizens Bank, 2161 W. Vienna, Clio, MI 48420
73. Clark Accounting Service, 13304 Jennings, Clio, MI 48420
74. Clio Area Amphitheater, P.O. Box 532, Clio, MI 48420
75. Clio Area Art Society, P.O. Box 405, Clio, MI 48420
76. Clio Area Big Boy, 4447 W Vienna, Clio, MI 48420
77. Clio Area Community Patron, 3065 E Willard, P.O. Box 300, Clio MI 48420
78. Clio Area Sports Complex, P.O. Box 445, Clio, MI 48420
79. Clio Body Shop, 117 W. Johnson, Clio, MI 48420
80. Clio Bowling Arcade, G,3345 W. Vienna, P.O. Box, Clio, MI 48420
81. Clio Cast & Crew Inc., P.O. Box 184, Clio, MI 48420
82. Clio Chrysler Plymouth Dodge, 4239 W. Vienna, Clio, MI 48420
83. Clio Cinema, Inc., G-2143 W. Vienna, Clio, MI 48420
84. Clio Classic Auto Wash, 400 W. Vienna, Clio, MI 48420
85. Clio Community Education, R. Negrinelli, Dir., 430 N. Mill, Clio, MI 48420
86. Clio Convalescent Center, G-13137 Clio Rd. P.O. Box, Clio, MI 48420
87. Clio Downtown Development, Authority, 505 W. Vienna, Clio, MI 48420
88. Clio Emergency Medical, G-2181 W. Vienna, Clio, MI 48420
89. Clio Equipment Repair, 11185 N. Jennings, Clio, MI 48420
90. Clio Floor Covering, 108 Center, Clio, MI 48420
91. Clio Golf Course, G-13141 Linden Rd., Clio, MI 48420
92. Clio Horseshoe Club, c/o Connie Quillenn, 583 Poplar, Clio, MI 40420
93. Clio Kettle Restaurant Alex Nedanis, G-2135 W. Vienna, Clio, MI 48420
94. Clio Lumber Co., G-5156 W. Vienna, Clio, MI 48420
95. Clio Podiatry Center, Dr. Donald Lutz, G4091 W. Vienna, Clio, MI 48420
96. Clio Police Dept., 505 W. Vienna, Clio, MI 48420
97. Clio Rotary Club, c/o Dennis Dinsmore, P. O. Box, Clio, MI 48420
98. Clio Senior Citizen Center, 2080 W. Vienna, Clio, MI 48420
99. Clio Shell Gas Station, 4141 W. Vienna,, Clio, MI 48420
100. Clio Soccer AYSO 476, c/o Frank Campbell, 2187 Hayward, Clio, MI 48420
101. Clio Tanning & Fitness & A-1 Fence, I 1515 N. Saginaw, Clio, MI 48420
102. Clio Towing, 12037 N, Saginaw, Clio, MI 48420
103. Clio Vision Service, G-21 55 W. Vienna, Clio, MI 48420
104. Clio Youth Sports Complex, c/o Tom Healey, 4155 E. Vienna, Clio, MI 48420
105. Coffee Haus, 109 S. Mill, Clio, MI 48420
106. Cole Consulting, 6246 W. Vienna, Clio, MI 48420
107. Color Perfect, 4035 W. Lake, Clio, MI 48420
108. Complete Site Development, 1211 E. Lake, Clio, MI 48420
109. Conlee Oil Co., 815 S. Mill, Clio, MI 48420
110. Corcoran Engineering, George Corcoran, 571 W. Vienna, Clio, MI 48420
111. Coreena Storms, 3393 Michelle Ct., Clio, MI 48420
112. Counter Intelligence, Robert Beeches, 12479 Genesse, Clio, MI 48420
113. Country Belle, 1189 E. Vienna, Clio, MI 48420
114. Country Hair Depot, 12420 N. Saginaw, Clio, MI 48420
115. Country Hall, 5039 W. Dodge, Clio, MI 48420

FAIRCOM FLINT INC.
Petition for Rulemaking for Clio, Michigan

ATTACHMENT A

- 116. Country Welcome, 14132 N. Saginaw, Clio, MI 48420
- 117. Countyline Store, 11483 Bray Rd., Clio, MI 48420
- 118. Cousineau, Martin, D.C., 143 W. Vienna, Clio, MI 48420
- 119. Creative Cuisine by Sylvia, P. O. Box, 5496 E. Farrand, Clio, MI 48420
- 120. Creative Food & Beverage Service, 11433 Berkshire, Clio, MI 48420
- 121. Crompton Sste Development, Contractors, 5090 W. Franam, Clio, MI 48420
- 122. Crystal Gardens Banquet Hall, 3289 Field Rd., Clio, MI 48420
- 123. Curnmer Realty, 10280 Clio Rd, Clio, MI 48420
- 124. D & B Heating, P. O. Box, 2285 E. Farrand, Clio, MI 48420
- 125. D & T Machines & Tools, 11395 N. Saginaw, Clio, MI 48420
- 126. Dance Kick Center, c/o Kathy Pane, 172 W. Vienna #4, Clio, MI 48420
- 127. Dave & Teri's Towing, 12433 Webster, Clio, MI 48420
- 128. Davis Ram Cars, 2359 E Dodge Rd, Clio, MI 48420
- 129. DEB Photography, 9233 Lawncrest, Clio, MI 48420
- 130. Debbie's Cellular Cuts, 9064 Webster, Clio, MI AWO
- 131. Deirdre's, 110 W. Vienna, Clio, MI 48420
- 132. Dinsmore Group, P. O. Box 273, 740 Center, Clio, MI 48420
- 133. Dixie Diner, 12099 N. Saginaw, Clio, MI 48420
- 134. Dixie View Auto Parts, c/o John Phillips, G-13387 N. Saginaw, Clio, MI 48420
- 135. Do's Doom & Windows, 4184 W. Lake, Clio, MI 48420
- 136. Dodge House Motel, 14010 N. Saginaw, Clio, MI 48420
- 137. Dodge Road Visitors Center, P O BOX, Clio NG 49420
- 138. Doggy Depot, 317 W. Vienna, Clio, MI 48420
- 139. Doke's Concrete, 14151 N. Saginaw, Clio, MI 48420
- 140. Dollar's & Cents, Andy Abuieta, G-2153 W. Vienna, Clio, MI 48420
- 141. Don's Auto Repair, Donald Tickle, G-10005 Clio Rd., Clio, MI 48420
- 142. Donald E. Lee, 11334 Sunset, Clio, MI 48420
- 143. Donald Holbin, Builder, 2481 W. Lake, Clio, MI 48420
- 144. Donna's Haircrossings, 319 W. Vienna, Clio, MI 48420
- 145. Dorothy's Beauty Shop, 699 S. Mill, Clio, MI 48420
- 146. Dotty's Feed & Farm Supply, 315 W. Vienna, Clio, MI 48420
- 147. Douglas & Son Custom Cabinetry, 5232 W. Vienna, Clio, MI 48420
- 148. Dr. James E. Hicks, 102 W. Vienna, Clio, MI 48420
- 149. Dr. Siva Sankaran, M.D., 3296 W. Vienna, Clio, MI 48420
- 150. Dunkin Donuts, G-4465 W. Vienna, Clio, MI 48420
- 151. Easton Installation, 13398 N. Jennings, Clio, MI 48420
- 152. Eastside Wholesale, P,O Box, G-11539 N. Saginaw, Clio, MI 48420
- 153. Econo Lodge, 4294 W. Vienna, Clio, MI 48420
- 154. Ed's Archery, G 4483 E. Vienna, Clio, MI 48420
- 155. Elizabeth's Flowers, 5045 W. Dodge, Clio, MI 48420
- 156. Elko Hair Design, Roy Fronsee, 303 S. Mill #2, Clio, MI 48420
- 157. Emmendorfer, Mason Contrac., 11238 N. Elms, Clio, MI 48420
- 158. Energy Management Systems, 3365 Andrea Court, Clio, MI 48420
- 159. Enhanced Manufacturing, P.O. Box 12018 N- Liberty, Clio, MI 48420
- 160. Equity Financial Co., Mark Borowitz, 14367 Clio, Clio, MI 48420
- 161. Ernie's Beer & Wine, G-13167 N. Saginaw, Clio, MI 48420
- 162. Expressway Ford, Inc., P.O. Box G-4325 W. Vienna, Clio, MI 48420
- 163. EZ Alarms, 7106 W. Vienna, Clio, MI 48420
- 164. Fahey's Auto Restoration, Michael L. Fahey, 226 Pine, Clio, MI 48420
- 165. Family Dollar, 500 Mill, Clio, MI 48420
- 166. Farmer Jack, G-2219 W. Vienna, Clio, MI 48420
- 167. Farmers Ins. Group, 3313 W. Vienna, Clio, MI 46420
- 168. Farrandville Bar & Grill, 12698 N. Saginaw, Clio, MI 48420
- 169. Fellowship Baptist Church, G-14046 N. Saginaw, Clio, MI 48420
- 170. Fifties Pizza, J & E Casslmon, 321 W. Vienna, Clio, MI 48420
- 171. Filpansick Brothers Trucking, 5214 W. Dodge, Clio, MI 48420
- 172. First Of America Bank, 107 E. Vienna, Clio, MI 48420
- 173. Fisherman's Park, 3358 E. Vienna, Clio, MI 48420
- 174. Floral Depot, 204 S. Railway, Clio, MI 48420
- 175. Floral Expressions, Patricia Whipple, 186 W. Vienna, Clio, MI 48420

FAIRCOM FLINT INC.
Petition for Rulemaking for Clio, Michigan

ATTACHMENT A

176. Fohey Veterinary Hospital, P.O. Box, 824 S. Mill, Clio, MI 48420
177. Frank Radtke, D.D.S., 2128 W. Vienna, Clio, MI 48420
178. Fuller Apts., 400 Fuller, Clio, MI 48420
179. Harmon a Son, 12216 N. Center, Clio, MI 49420
180. Health Plus, Ann. Betsy Condon, P.O. box 1700, Flint MI 48501-1700
181. Hickory Meat Block, 425 W. Vienna, Clio, MI 48420
182. Hidden Secrets, 127 W. Vienna, Clio, MI 48420
183. Hi-Vacs, Inc., 12074 N. Geneses, Clio, MI 48420
184. Hobson Home Improvement, 3232 E. Farrand, Clio, MI 48420
185. House of Fabrics, G-2241 W. Vienna, Clio, MI 48420
186. Hungry Howie's, 530 S. Mill, Clio, MI 48420
187. Impression Printing, 11467 N. Saginaw, Clio, MI 48420
188. Independent Bank East Michigan, G-3500 W. Vienna, Clio, MI 48420
189. Janet Townsend, 2392 Meadowbrook, Clio, MI 48420
190. Jeff Esterline Real Estate, G-11462 N. Saginaw, Clio, MI 48420
191. Keil Harrison Insurance, MO
192. Lang's Auto Service, 11485 Dexter, Clio, MI 48420
193. Larry Eaton Insurance, 2113 W. Vienna, Clio, MI 48420
194. Leisure Days Travel, G-1364 E. Vienna, C110, MI 48420
195. Leo's Saw Shop, 10182 N. Saginaw, Clio, MI 48420
196. Lil' Dumplin Day Care, 9270 Bray, Clio, MI 48420
197. Limited Edition Comics & Cards, 420 W. Vienna, Clio, MI 48420
198. Little Caesar's, G-2133 W. Vienna, Clio, MI 43420
199. Little Giant Discount, 156 W. Vienna, Clio, MI 48420
200. Lonnie's Custom Design Studio, 2339 Marjorie Lane, Clio, MI 48420
201. Lonsway's Self Storage, 5180 W. Vienna, Clio, MI 48420
202. Lowell's House of Costumes, 11350 N. Saginaw, Clio, MI 48420
203. Loyd's Janitor Service, Loyd E. Camehl, 11440 N. Saginaw, Clio, MI 48420
204. Luttenbacher's Greenhouse, 3299 Pine, Clio, MI 48420
205. M & A Home Improvement, Mark Ashby, 11263 Clio, Clio, MI 48420
206. M & K Electrical, 11120 Langdon, Clio, MI 48420
207. Mantel Builder, 5365 W. Farrand, Clio, MI 48420
208. Maria's Barn Antiques, G-12213 N. Saginaw, Clio, MI 48420
209. Marian Realty, 131 Griffes, Clio, MI 48420
210. Marie's Refinishing, Clio, MI 48420
211. Marjo's Family Dining, G-13413 N. Saginaw, Clio, MI 48420
212. Mark's Electric, 2111 E. Farrand, Clio, MI 48420
213. Marlot Nursing Registry, 12270 N. Saginaw, Clio, MI 48420
214. Marquee Engraving William Rose, 164 W. Vienna #3, Clio, MI 48420
215. May Richey Builders 9115 N. Saginaw MI 48420
216. McDonald's Restaurant, #4363, G-4313 W. Vienna, Clio, MI 48420
217. McLaren Family Care, G-4216 W. Vienna, Clio, MI 48420
218. Mclimurray Excavating, 2292 E. Vienna, Clio, MI 48420
219. Murany's, 10175 Clio Rd., Clio, MI 48420
220. NBD Bank NA 4130 W. Vienna, Clio, MI 48420
221. Needham Service, Gerald L Needham, 3190 Wilman, Clio, MI 48420
222. Needles Pointe, 500 Mill, Clio, MI 48420
223. New Street Sign Company, Deb McClellan, 814 New St., Clio, MI 48420
224. New York Toning & Tanning, G-3337 W. Vienna, Clio, MI 48420
225. Nichols Barber Shop, Dennis Nichols, 122 N. Mill, Clio, MI 48420
226. Niec Trucking, 5107 E. Vienna, Clio, MI 48420
227. Nite Cap Tavern, 155 W. Vienna, Clio, MI 48420
228. Northbound Trailer Sales, 4299 W. Wilson, Clio, MI 48420
229. O'Graydee's, Gordon Faith, G-2146 W. Vienna, Clio, MI 48420
230. Oak Grove Motel, Clay Curtis, 14298 N. Saginaw, Clio, MI 48420
231. Olympia Lawn Care, 9221 Maplewood, Clio, MI 48420
232. Post Office, 800 S. Mill, Clio, MI 48420
233. Quality Oil Change, 14465 Neff, Clio, MI 48420
234. Quality Plus Auto, G-10436 Clio Rd., Clio, MI 48420
235. Quality Pool Supply, G-5122 W. Vienna, Clio, MI 4B420
236. Quick Save Food Store, 108 E. Vienna, Clio, MI 48420

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237. Quik Sav No. 2, G-6015 E. Vienna, Clio, MI 48420
238. R & B Market Inc., G-12587 N. Saginaw, Clio, MI 4B420
239. Radio Shack, G-2167 W. Vienna, Clio, MI 48420
240. Rainbow Factory Collectibles, 131 W. Vienna, Clio, MI 48420
241. Rainsoft, 113 W. Vienna, Clio, MI 48420
242. Ratza Collision & Restoration, 13405 Saginaw, Clio, MI 48420
243. Red Alert Computing, 1590 W. Wilson, Clio, MI 48420
244. Red's Towing, 205 W. Johnson, Clio, MI 48420
245. Reinig & Sons Roofing, Scott Reinig, 5377 E. Vienna, Clio, MI 48420
246. Rent-Ovators, 6336 W. Frances, Clio, MI 48420
247. Richard Holbin, Builder, 14106 Clio Rd., Clio, MI 48420
248. Risk Management Education Assoc., 4417 W. Wilson, Clio, MI 48420
249. Rite Aid Drugs, G-2155 W. Vienna, Clio, MI 48420
250. Roadside Assistance, 205 W. Johnson Rd., Clio, MI 46420
251. Robert K. Stuart, Ins., 2113 W. Vienna, Clio, MI 48420
252. Robert Smith Carpentry, 14025 Clio Rd., Clio, MI 48420
253. Rolison's Service, 10213 N. Saginaw, Clio, MI 48420
254. Royston Auto Sales, G-7027 W. Vienna, Clio, MI 40420
255. RPM Sports, Rich Zalewski, 303 Smith, Apt. 206, Clio, MI 48420
256. Runyan's Country Time Farm, 10235 Webster, Clio, MI 48420
257. Russell's Studio of Dance, P.O. Box 391, Clio, MI 48420
258. S & H Glass, Co., G-14132 N. Saginaw, Clio, MI 48420
259. S & J Concrete, 13051 Country Club Dr., Clio, MI 48420
260. S & R Process Service, 3214 W. Frances, Clio, MI 48420
261. Sanborn Storage, 215 State, Clio, MI 48420
262. Scannell Racing Engine & Machine Shop 2269 E. Farrand Clio , MI 48420
263. Schwan's Sales, 801 Tacoma, Clio, MI 48420
264. Second Time Around, 434 W. Vienna, Clio, MI 40420
265. Sedgewick Business & Office Service, 225 Darrow, Clio, MI 48420
266. Serendipity, 509 W. Vienna, Clio, MI 48420
267. Shands Heating & A\c, 9152 Lawncrest, Clio, MI-48420
268. Shepherd Center, 182 W. Vienna, Clio, MI 48420
269. Short's Roofing, 318 Railway, Clio, MI 48420
270. Shumate, CPA, P.O. Box, 114 W. Vienna, Clio, MI 48420
271. Siding Worid, 11539 N. Saginaw, Clio, MI 48420
272. Silhouette Styling Salon, 11461 N. Saginaw, Clio, MI 48420
273. Silvio's Restaurant, P.O. Box 6, Clio, MI 48420
274. Simms Chevrolet, P.O. Box 340, G-4220 W. Vienna, Clio, MI 48420
275. Singleton's Satellite & Antenna, Service, 12186 N. Unden, Clio, MI 48420
276. Skip's Auto Service, G-N10 W. Vienna, Clio, MI 48420
277. Smith Enterprises, 14315 Weir, Clio, MI 48420
278. Somethin's Fishy, 3269 W. Vienna, Clio, MI 48420
279. Spirit Restaurant & Coney Island, G-7011 W. Vienna, Clio, MI 48420
280. Standard Federal, 11258 Clio Rd., Clio, MI 48420
281. Star of Hope, 500 S. Mill, Clio, MI 48420
282. State Farm Insurance, INVVienna, Clio, MI 48420
283. Stevens Auto Repair, 6390 W. Dodge, Clio, MI 48420
284. Stimac, Realty, 13256 Bray, Clio, MI 48420
285. Stokes Tax & Accounting, 14231 N. Genesee, Clio, MI 48420
286. Stor-Moore Ministorage, 4094 W. Willard, Clio, MI 48420
287. Storms Reeky, Howard Storms, G41500 N. Saginaw, Clio, MI 4U20
288. Strand Studio, 11233 W. Lake, Clio, MI 48420
289. Subway, 4254 W. Vienna, Clio, MI 48420
290. Superior Collision, G-6010 W. Vienna #A, Clio, MI 48420
291. Taco Bell, G-4331 W. Vienna, Clio, MI 48420
292. Tailored Burglar Alarms, 609 S. Mill, Clio, MI 48420
293. Tambling Corp., 12060 N. Unden, Clio, MI 48420
294. Taylor Distributors, 13281 N. Bray, Clio, MI 48420
295. Taylor Locksmith, 116 Griffes, Clio, MI 48420
296. Taylor Well Drilling, Brian Taylor, G-41103 Lewis, Clio, MI 48420
297. The Equitable, Rob Houghton, 3365 Andrea Court, Clio, MI 48420

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298. The Hearing Center, 102 112 W. Vienna, Clio, MI 48420
299. The Telephone Store, 303 S. Mill, Clio, MI 48420
300. Thefford Senior Citizen Center, 11495 N. Center, Clio, MI 48420
301. Thefford Township, 4014 E. Vienna, Clio, MI 48420
302. Thompson's Custom Formica, 1085 W. Dodge, Clio, MI 48420
303. Thompson's Sales & Service G-9396 N. Saginaw MI 48420
304. Tim's Handyman Service, 12400 N. Saginaw, Clio, MI 43420
305. Time 4 Tots, 104 Washington, Clio, MI 48420
306. TM Smith Heating, G-12537 N. Saginaw, Clio, MI 48420
307. Togo Enterprises, 3404 W. FranrAis, Clio, MI 48420
308. Top Coat Goal Coating, 1279 E. Vienna, Clio, MI 48420
309. Total Communications & Sound, Inc., G-13488 N. Clio, Clio, MI 49420
310. Touch of Class Nails; 11500 N. Saginaw, Clio, MI 48420
311. Trade Winds RV Sales, G-10171 N. Saginaw, Clio, MI 48420
312. Tradewinds Mobile Court, 0.12420 N. Saginaw, Clio, MI 48420
313. Transmission By Don, 12057 N. Saginaw, Clio, MI 48420
314. Unlimited Designs, 3493 W. Vienna, Clio, MI 48420
315. VG's Supermarket, 710 S. Mill, Clio, MI 48420
316. Video Camera Engineers, 4047 E. Farrand, Clio, MI 48420
317. Vie's Grocery, 10211 Clio Rd., Clio, MI 48420
318. Vienna Greens Golf Course, 1184 E. Tobias, Clio, MI 43420
319. Vienna Twp. Sheriff's Substation, 3370 W. Vienna, Clio, MI 48420
320. Walther & Sons, 3390 W. Lake, Clio, MI 48420
321. Warner Electric, 13326 Webster, Clio, MI 48420
322. Water Wonderland, Dais Raycraft, G40092 N. Dort, Clio, MI 48420
323. Webster & Garner, 3346 W. Vienna, Clio, MI 48420
324. Wendy's Restaurant Concept Mgt., 164-5 W. Vienna, Clio, MI 48420
325. West Thetford House, 1376 E. Hurd, Clio, MI 48420
326. Westown Hair Care Center, 3493 W. Vienna, Clio, MI 48420
327. West-Wagner House, 6509 W. Dodge, Clio, MI 48420
328. WEYI-TV Channel 25, P. O. Box 250, Clio, MI 48420
329. Whipple Funeral Home, 503 N. Mill, Clio, MI 48420
330. Wholesale Tire North, G-12194 N. Saginaw, Clio, MI 48420
331. Wilson's Plumbing, 3468 W. Francis, Clio, MI 48420
332. Wind-Drift Trailer Supply, 6508 W. Vienna, Clio, MI 48420
333. Winter Guard Vinyl, 960 Tacoma, Clio, MI 48420
334. Wirsing Welding & Fabricating 14324 Linden, Clio, MI 48420
335. Witmer's Grocery, 1372 E. Lake, Clio, MI 48420
336. Wood's Plumbing & Heating, 12430 Tuscola, Clio, MI 48420
337. Woodwright Shop, Donald Smith, 2201 W. Wilson, Clio, MI 48420
338. Worthings Corp., G-11463 N. Saginaw, Clio, MI 48420
339. Worthings Welcome Homes, 12263 Bray, Clio, MI 48420
340. Wright & Randall, D.D.S., 4279 W. Vienna, Clio, MI 48420
341. Your Town Service Center, 815 S. Mill, Clio, MI 48420
342. Z-Weigh Inc., G-12250 N. Saginaw, Clio, MI 48420

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ATTACHMENT A

**CIVIC, COMMUNITY AND RELIGIOUS ORGANIZATIONS
MEMBERS OF CLIO AREA CHAMBER OF COMMERCE**

1. American Legion, c/o Ames Schweitzer, 11447 N. Jennings, Clio, MI 48420
2. Bethany Methodist Church, P. O. Box 353 E. Vienna, Clio, MI 48420
3. Birch Run Chamber of Commerce, P. O. Box 163, Clio, MI 48420
4. Charter Twp. of Vienna, 3400 W. Vienna, Clio, MI 48420
5. City of Clio, 505 W. Vienna, Clio, MI 48420
6. Clio Area Historical Association, Rose Coulman, 4018 W. Lake, Clio, MI 49420
7. Clio Area Library, G-2080 W. Vienna, Clio, MI 48420
8. Clio Area Optimist Club, c/o Lynda Losan 12361 Field, Clio, MI 48420
9. Clio Area Parks & Recreational, Board, 506 W. Vienna, Clio, MI 48420
10. Clio Area Schools, 430 N. Mill, Clio, MI 48420
11. Clio Assembly of God, 305 New, Clio, MI 48420
12. Clio Boy Scouts 104, c/o Michael Reinhart, 7405 W. Farrand, Clio, MI 48420
13. Clio Church of Christ, 219 New St., Clio, MI 48420
14. Clio Church of God, G-14173 N. Saginaw, Clio, MI 48420
15. Clio Community Council, Doug Vance, 595 Clarion, Clio, MI 48420
16. Clio Cub Scouts 101, c/o Harold West, 4882 Marcy, Clio, MI 48420
17. Clio Cub Scouts, c/o Bruce Burger, 12370 Clio Rd., Clio, MI 48420
18. Clio Eagles Aerie 3609, P. O. Box, 13267 N-Saginaw, Clio, MI 48420
19. Clio Eagles Auxiliary 3609, P.O. Box 13287 Saginaw, Clio, MI 48420
20. Clio Fire Dept., 505 W. Vienna, Clio, MI 48420
21. Clio Free Methodist Church, 701 Field, Clio, MI 48420
22. Clio Girl Scouts, c/o LaDonna Burzyck, 13329 N. Bray, Clio, MI 48420
23. Clio Lions Club, c/o Denny Bellinger, 4437 Field, Clio, MI 48420
24. Clio Little League, c/o Frank Everett, 4364 E. Lake, Clio, MI 48420
25. Clio Ministerial Assoc., c/o Rev. Robert Koch, 192 W. Vienna, Clio, MI 48420
26. Clio Wesleyan Church, G-2220 W. Vienna, Clio, MI 48420
27. Clio Youth Football, c/o Bob Helmer, 2117 W. Lake, Clio, MI 48420
28. Community Church of God, G-1 216 W. Vienna, Clio, MI 48420
29. Community Light House Church, 6517 W. Dodge, Clio, MI 48420
30. DeMolay, P. O. Box 257, Clio, MI 48420
31. Elf Khurefeh Temple AAONMS, 4240 W. Wilson, Clio, MI 48420
32. First Baptist Church, 218 S. Mill, Clio, MI 48420
33. RLDS Church, G41041 W. Vienna, Clio, MI 48420
34. Senator John D. Cherry, Jr., 411 S Orme Circle, Clio, MI 48420
35. SS. Charles & Helena Catholic, Church, 230 E. Vienna, Clio, MI 48420
36. VFW Post No. 1452, G-10380 N. Saginaw, Clio, MI 48420
37. Victory Tabernacle, 1497 Pine, Clio, MI 48420
38. Vienna Chapter 283 O.E.S., c/o Diane Knapp, P.O. Box 257, Clio, MI 48420
39. Vienna Lodge 206 F. & A.M., P.O. Box 257, Clio, MI 48420
40. West Vienna United Methodist Church, 5485 W. Wilson, Clio, MI 48420

FAIRCOM FLINT INC.
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ATTACHMENT B

**ENGINEERING STATEMENT
OF
D.L. MARKLEY & ASSOCIATES, INC.**

ATTACHMENT B

Petition for Rulemaking

The following engineering statement and attached exhibits have been prepared for Faircom Flint, Inc., licensee of FM broadcast station WWBN at Tuscola, Michigan, and are in support of their Petition for Rulemaking to modify Section 73.202(b), Table of Allotments, of the Federal Communications Commission Rules and Regulations.

The petitioner requests that the Table of Allotments be modified as follows:

<u>City</u>	<u>Existing</u>	<u>Proposed</u>
Tuscola, MI	268A	-----
Clio, MI	-----	268A

As shown on the attached single channel study, the proposed allotment may be allocated to Clio with a site restriction of 9.60 kilometers North Northwest of the city. For purposes of the allocation, the reference coordinates will be 43° 15' 47" North and 83° 45' 40" West for Clio, Michigan. It should be noted that the single channel spacing study indicates a short spacing to a vacant Canadian allotment at Sarnia, Ontario.

Under MM Docket 95-7, the Commission notes that the allocation at Tuscola is a specially negotiated short-spaced allotment with regard to Sarnia, Ontario. From the current reference site for the Tuscola allocation, the Sarnia allotment is 115.65 kilometers distant. It should be noted from the attached

single channel study that this distance is not reduced by the change in community of license to Clio.

Clio is an incorporated city with a 1990 population of 2,629 persons, while Tuscola is an unincorporated township. Tuscola does not appear on any commercially printed map. In the Michigan Census Guide, Tuscola is listed only as an unincorporated township.

With the present site authorized for WWBN, the predicted population within the 60 dBu (1.0 mV/m) F(50,50) service contour is 168,851 persons. This value was determined from EDX Engineering Software Packages. It should be noted that this figure differs from that submitted under BPH-970328IG, however, the value contained in that file was determined by an external data supplier using data along every ten degrees of azimuth. The data contained within this petition was acquired by sampling population at the block level along every degree of azimuth, and is believed to be considerably more accurate.

If the WWBN transmitter were to be located at the proposed Clio, Michigan reference site, it has been predicted that 355,565 persons would reside within the 60 dBu F(50,50) service contour. This population value represents an increase of 186,714 persons, which is more than double the number currently served by WWBN.

It has also been predicted that 29,966 persons who currently receive a 70 dBu or greater field strength would not if the site were to be relocated to the Clio reference site. However, a gain of 163,249 persons is predicted with the move to the Clio site. If the 60 dBu predicted contour is examined, 47,657 persons receiving at least that field strength would be lost, while a gain of 234,143 persons would be experienced.

All population figures contained in this report were generated through the use of EDX Engineering software packages. These packages sample the 1990 U.S. Census data on a block level.

Exhibit E-1, attached to this petition, demonstrates that there are four other FM facilities that serve the Tuscola region with a 70 dBu or greater signal level. In addition, as Exhibit E-2 demonstrates, with a site location at, or near the proposed Clio reference coordinates, Tuscola would still be served with a 70 dBu or greater signal from WWBN. As a result, it is respectfully submitted, that the unincorporated Tuscola region will not lose its only local service through the reallocation of WWBN to Clio.

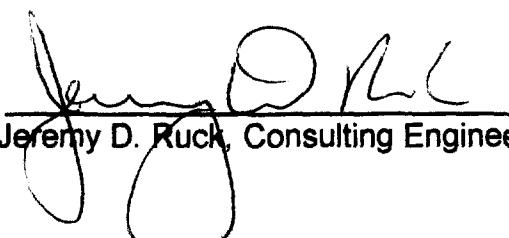
D.L. Markley & Associates, Inc.

Consulting Engineers

Therefore, it is believed that the public interest would be better served by allocating channel 268A to Clio as a first local service, instead of keeping the allocation at the unincorporated region of Tuscola.

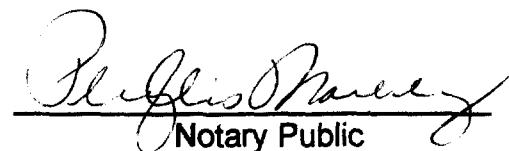
The preceding statement and attached exhibits have been prepared by me or under my direction and are true and accurate to the best of my belief and knowledge.

3-5-98
Date



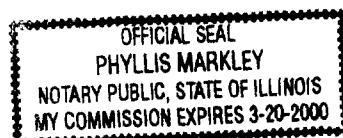
Jeremy D. Ruck, Consulting Engineer

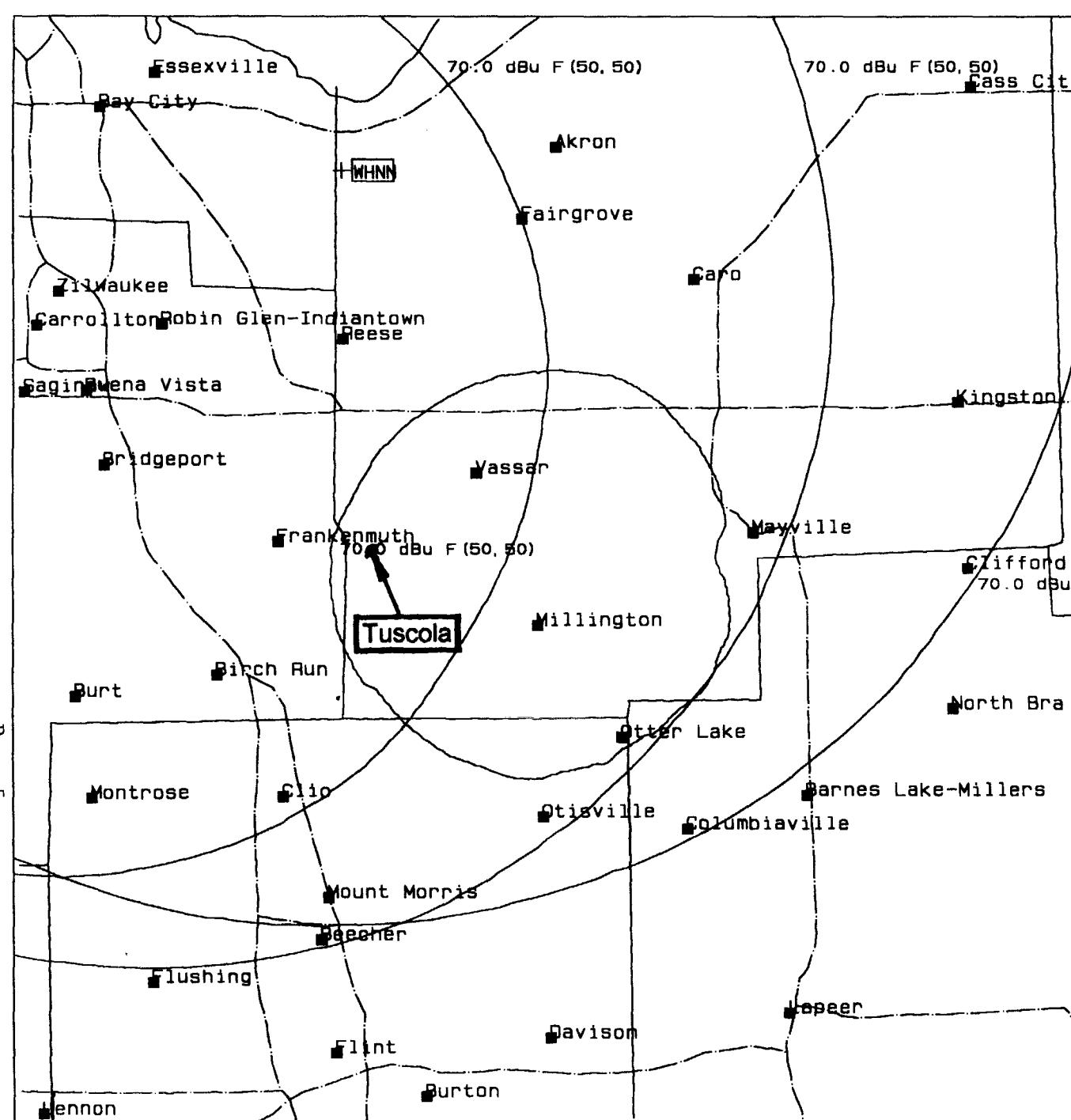
Subscribed and sworn to before me this 5th day of March, 1998.



Phyllis Markley
Notary Public

My Commission Expires:





SHDMAP (tm) : New map

Propagation model: FCC-FCC
 Time: 50.00% Loc: 50.00% Margin: .0 dB
 Climate: Continental Temperate
 Gndcvr: None
 Atm. factor: None
 K Factor: 1.333
 RX Antenna: Omni
 Height: 9.1 mtrs AGL Gain: .0 dBd

Field strength (at remote)

■ 70.0 dBuV/m

Minimum threshold level: -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WHNN *	493.0	50.00	OM-H	N 43 33 10.00 W 83 41 24.00
grp: 1	96.1000	MHz		
WKCG	332.0	46.99	OM-H	N 43 25 4.00 W 83 55 6.00
grp: 1	98.1000	MHz		
WOWE	329.0	34.77	OM-H	N 43 17 56.00 W 83 30 34.00
grp: 1	98.9000	MHz		
WIOG	427.0	49.34	OM-H	N 43 28 24.00 W 83 50 40.00
grp: 1	102.5000	MHz		



FM Station Service
 Depicting Tuscola, Michigan
 March, 1998 Exhibit E-1

